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7 TIME USA, LLC  
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10 **UNITED STATES DISTRICT COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

12 IN RE: SOCIAL MEDIA ADOLESCENT  
13 ADDICTION/PERSONAL INJURY  
14 PRODUCTS LIABILITY LITIGATION

15 THIS DOCUMENT RELATES TO:  
16 ALL ACTIONS

MDL No. 3047  
Case No. 4:22-md-03047-YGR

**DECLARATION OF CHARLOTTE  
ALTER IN SUPPORT OF MOTION TO  
INTERVENE AND PROTECT ACCESS**

Judge: Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

Hearing:

Date: October 21, 2025  
Time: 2:00 p.m.  
Place: Courtroom 1, Fourth Floor

1 I, Charlotte Alter, declare as follows:

2 1. I am an award-winning journalist and a Senior Correspondent at TIME, a global  
3 media brand and one of the oldest and most well-recognized weekly newsmagazines in America.  
4 With more than 15 million print readers and more than 50 million followers across social media  
5 channels, TIME is a critical source of information for the public. It is owned and operated by  
6 TIME USA, LLC.

7 2. Over the course of my 12-year career at TIME, I have written 18 cover stories and  
8 won numerous awards. I have won, amongst other awards, three Newswomen's Club Awards —  
9 including for best feature and best political reporting — and a GLAAD Award. I am also the  
10 author of *The Ones We've Been Waiting For: How a New Generation of Leadership Will*  
11 *Transform America* (2020), a book that chronicles the rise of a new generation of millennial  
12 politicians. I am a general-assignment reporter. My assignments have included presidential  
13 elections, Covid, youth activism around climate change, and gun violence. I appear regularly on  
14 television to discuss my reporting.

15 3. For most of the last year, my coverage has focused on the impact of social media  
16 on kids and teenagers.<sup>1</sup> My sustained beat coverage has included stories that address the  
17 allegations at issue in this MDL.

18 4. For example, on August 20, 2025, TIME published my story titled, “‘Everything I  
19 Learned About Suicide, I Learned On Instagram.’”<sup>2</sup> As the article states, the eponymous quote  
20 came from MDL Plaintiff Taylor Little who first attempted suicide at age 13 after consuming self-  
21 harm content on social media. This article also covered studies finding mental-health risks from  
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24 <sup>1</sup> E.g. Charlotte Alter, *She Says Social-Media Algorithms Led to Her Eating Disorder. Now She's*  
25 *Suing TikTok and Instagram*, TIME (June 18, 2025, at 4:00 AM PT),  
26 <https://time.com/7295323/social-media-case-instagram-tiktok/> (reporting on this multi-district  
27 litigation); Charlotte Alter, *Inside the Parent-Led Movement For Phone-Free Schools*, TIME  
(Aug. 4, 2025, at 4:00 AM PT), <https://time.com/7307163/parent-movement-phone-free-schools/>  
(covering legislative reform efforts to curb youth phone addiction).

28 <sup>2</sup> Charlotte Alter, *'Everything I Learned About Suicide, I Learned On Instagram.'*, TIME (Aug.  
20, 2025, at 4:00 AM PT), <https://time.com/7310444/instagram-lawsuit-self-harm/>.

1 teen social-media use, a whistleblower's attempt to address these risks inside Meta, and other  
2 MDL Plaintiffs' allegations.

3 5. TIME helps shape the national narrative about the impact of social media use on  
4 public health, and especially the health of minors, through consistent beat coverage with fact-  
5 based reporting and analysis.

6 6. TIME regularly relies on access to public documents, including court records, in its  
7 reporting. We have a demonstrated commitment to protecting freedom of the press and demanding  
8 government transparency. For example, on May 1, 2025, Time joined the One Free Press  
9 Coalition in publishing a list of the ten most urgent threats to press freedom around the world,  
10 bringing attention to fellow journalists who are being imprisoned for seeking to tell the truth.<sup>3</sup>

11 7. I believe that accessing the evidence subject to protective order that is filed in  
12 support or opposition to dispositive and *Daubert* motions in this litigation will likely further my  
13 ability to report on this litigation specifically and the health impacts of social-media use on  
14 children more generally, including any actions taken by social media companies to induce or  
15 prevent such harms.

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17 I declare under penalty of perjury under the laws of the United States of America that the  
18 foregoing is true and correct. Executed this 16th day of September, 2025, at Brooklyn, New York.

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21 CHARLOTTE ALTER

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28 <sup>3</sup> One Free Press Coalition, *The Most Urgent Threats to Press Freedom Around the World*, TIME  
(May 1, 2025, at 6:13 AM ET),